



October 6, 2026

Diana Welling
State Historic Preservation Officer
Ohio History Connection
800 E. 17th Avenue
Columbus, OH 43211

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, American Electric Power, Haviland to Paulding 69kV Transmission Line Rebuild Project, Paulding County, Ohio

Dear Ms. Welling,

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has executed a Federal loan guarantee agreement with American Electric Power (AEP or Borrower) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to AEP is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. AEP has identified the Haviland to Paulding 69 kilovolt (kV) Transmission Line Rebuild Project (the Project), located in Paulding County, Ohio, for potential inclusion in the loan guarantee.

The purpose of this letter is to formally initiate consultation with the Ohio State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents descriptions of the undertaking, the Area of Potential Effects (APE), the efforts to identify historic properties, and the undertaking's effects on historic properties; and seeks your concurrence with DOE's Finding of Historic Properties Affected for this Project.

Cultural resource reports are included as Attachments 1 and 2, and supplemental historic resource photographs are included as Attachment 3. An Ohio SHPO Project Summary Form is included as Attachment 4.

Description of the Undertaking

DOE's proposed action is the issuance of Federal financing to the Borrower for the undertaking (i.e., the Project), which involves rebuilding approximately 10.7 miles of rebuilding existing transmission infrastructure in its current location within the existing

centerline, except for one deviation of 0.8 mile between transmission Structures #8 and #23. The Project will also expand the overall width of the right-of-way (ROW) from 50 feet to 60 feet to meet electrical clearance requirements. A total of 176 existing transmission line structures will be removed and replaced with 180 new structures. Existing facilities consist of approximately 145 wood pole structures ranging from 55 to 80 feet in height and approximately 31 galvanized steel pole structures ranging from 80 to 90 feet in height. Within the ROW, these facilities will be replaced with 180 galvanized steel pole structures, consisting of 168 tangent structures and 12 custom structures. Tangent structures will range from approximately 90 to 120 feet in height, and custom structures will range from approximately 70 to 90 feet in height. The proposed rebuild will also include the installation of new overhead conductors and shield wire.

Access roads and work pads will be placed within the ROW, or immediately adjacent to the ROW, for use during construction. Construction activities consistent with transmission lines typically include erosion and sediment control, temporary access roads, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration once construction is completed. Approximately 0.8 acres of tree clearing will be conducted in accordance with the applicable United States Fish and Wildlife Service (USFWS) tree clearing window and any other relevant environmental requirements.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. Within the APE, DOE distinguishes different survey areas for identifying archaeological and historic architectural resources (hereafter, the “archaeological survey area” and “architectural survey area”). The archaeological survey area is defined as the construction footprint of the Project where potential physical effects caused by ground-disturbing activities may occur, also known as the limits of disturbance (LOD). The architectural survey area includes the area in the Project LOD and may apply a distance buffer, as appropriate, within which potential non-physical effects (e.g., visual, vibrational, auditory, or atmospheric) could occur. These survey areas collectively comprise the APE for the Project.

The Project’s archaeological survey area includes the area where potential ground disturbance would occur within the expanded ROW corridor (approximately 77.9 acres) and proposed temporary access roads and construction workspace extending outside the ROW (approximately 26.5 acres), totaling approximately 104.4 acres. The Project’s architectural survey area includes the area within the ROW plus the area within a 1000-foot radius of the Project.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following thirteen (13) federally recognized Tribes to see if they have an interest in the Project:

1. Citizen Potawatomi Nation, Oklahoma
2. Eastern Shawnee Tribe of Oklahoma
3. Forest County Potawatomi Community, Wisconsin
4. Hannahville Indian Community, Michigan
5. Little Traverse Bay Bands of Odawa Indians, Michigan
6. Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan
7. Miami Tribe of Oklahoma
8. Ottawa Tribe of Oklahoma
9. Peoria Tribe of Indians of Oklahoma
10. Prairie Band Potawatomi Nation
11. Seneca-Cayuga Nation
12. Shawnee Tribe
13. Wyandotte Nation

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and to identify any additional Tribes that may share an interest in the Project area so DOE EDF can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or necessary.

Records Search

As part of the Section 106 identification process, the Borrower contracted Weller & Associates, Inc. (Weller) to conduct cultural resource surveys. Weller prepared the cultural resources reports summarized below and included as Attachments 1 and 2.

Weller conducted a search of various archival sources, the Ohio SHPO inventory database, the National Register of Historic Places (NRHP), and various other archival sources to identify previously conducted surveys and previously recorded cultural resources and historic properties within the APE (a 1,000-foot radius surrounding the Project). This background research identified three (3) previous cultural resource surveys, one of which partially overlaps the current Project corridor. Six (6) previously recorded archaeological sites were identified in the study area, none of which are within the Project ROW. A total of five (5) previously recorded Ohio Historic Inventory (OHI) resources were identified in

the study area, one of which is located within the Project ROW. No NRHP-listed historic properties are within the APE, but one (1) of the OHI resources in the APE has previously been determined eligible for the NRHP (discussed below). Lastly, no cemeteries were identified in the study area.

Following the completion of background research, Weller completed Phase I cultural resources surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. The results of those additional investigations are provided in Attachments 1 and 2 and summarized below.

Archaeological Resources

The archaeological field investigations consisted of pedestrian walkover of the archaeological survey area employing visual inspection of the ground surface and subsurface testing where conditions allowed, following SHPO guidelines. Photographic documentation was utilized to provide evidence of the varying environments and disposition of the survey area. Severe prior disturbances associated with construction activities related to roadway and residential development were noted for some areas which were omitted from subsurface archaeological testing; visual inspection was conducted in these situations. The majority of the survey area consisted of agricultural land with suitable surface visibility to conduct systematic pedestrian reconnaissance. Subsurface shovel testing was also conducted in the areas where conditions were suitable. During the initial survey, a total of 93 shovel test units and four (4) shovel probes were excavated, none of which recovered cultural material.

The survey identified one (1) new archaeological sites in the APE of the current Project (33PA0401). The site has a temporally and functionally limited assemblage (historic-era kitchen-related refuse) and is limited to surface and/or plowzone contexts. This site is considered not eligible for the NRHP due to the limited artifact assemblage and lack of intact subsurface deposits or surface features, indicating a lack of integrity and potential to yield significant additional information. Additional details on the archaeological survey methods and results, maps, and photographs are provided in Attachment 1.

Historic Architectural Resources

The historic architectural survey included photographic documentation of above-ground resources in the APE that met the minimum 50-year threshold for NRHP consideration. The architectural survey identified a total of 25 new resources, two (2) previously recorded resources, and one (1) historic property in the APE. Building types and styles are consistent with patterns of settlement in the area and are mostly single-family residences and barns dating from the late-19th century to 1967. Stylistically, the buildings are mostly vernacular (exhibiting no formal academic style) but many them are mid-century Modern.

One (1) previously recorded OHI resource (PAU0362609) is eligible for listing in the NRHP (SHPO Determination of Eligibility # 77278). None of the other 27 resources documented in the APE were found to be associated with significant events, patterns of

events, or individuals in a manner necessary for inclusion in the NRHP under Criterion A or B. The buildings are typical of others in the area and throughout Ohio, are not the works of a master, and do not exhibit distinctive character-defining features; therefore, the resources are not eligible for inclusion in the NRHP under Criterion C. Additional details, maps, and photographs are included in Attachment 2.

Description of the Undertaking's Effects on Historic Properties

PAU0362609 was previously determined to be eligible for listing in the NRHP under Criterion A (SHPO Determination of Eligibility # 77278). The property is mapped within the Project ROW, adjacent to a transmission pole structure on the northeast corner of the intersection of Road 60 and Road 101 in the township of Blue Creek. When the field survey for the Project was conducted in June 2023, the structure was standing and was photographically documented (see Attachment 2, Figure 110). In AEP's August 2026 Project submission to DOE EDF, AEP informed DOE EDF that the building had since been demolished by the landowner, independent of any Project-related activities. A photograph showing the former location of PAU0362609, confirming that the structure is no longer extant, is included as Attachment 3.

Because the Project involves the proposed replacement of transmission structures along the ROW of an existing transmission line, the Project would not constitute a new or novel visual intrusion to the setting and the viewshed of this historic property would not be significantly altered by the Project. No physical alterations to the resource were proposed, and no visual, atmospheric, or audible elements would be introduced in a manner that would have disqualified the resource from being considered eligible for listing in the NRHP. Therefore, if the property were still extant as documented in the 2023 survey, the Project would have had no adverse effect on this historic property. However, since the property has been demolished since the field survey was conducted in 2023, as confirmed by the more recent photograph included in Attachment 3, the Project would have **no effect** on historic properties.

Requesting your Concurrence and Next Steps

Based on DOE EDF's review of the efforts to identify historic properties and conclusions drawn from this information, DOE EDF is issuing a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Ohio SHPO on the Finding of No Historic Properties Affected, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter**.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact David Johnson via email at david.johnson3@hq.doe.gov or EDF_Environmental@doe.gov.

Sincerely,

DONALD BROWN

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BROWN
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Donald Brown
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

- Attachment 1. Archaeological Survey Report
- Attachment 2. Architectural History Survey Report
- Attachment 3. Photographs of PAU0362609
- Attachment 4. Ohio SHPO Project Summary Form